


Approved:


ALEXANDER LI / KEVIN SULLIVAN
Assistant United States Attorneys

Before:

THE HONORABLE VALERIE FIGUEREDO
United States Magistrate Judge
Southern District of New York

23 MAG 3863

UNITED STATES OF AMERICA

v.

YIYI CHEN, a/k/a “Chiron,”
QINGZHOU WANG, a/k/a “Bruce,” and
FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,”

Defendants.

SEALED COMPLAINT

Violations of 21 U.S.C. §§ 841, 846, 959,
960, and 963; and 18 U.S.C. § 2

COUNTY OF OFFENSE:
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

DANIEL BROOKS, being duly sworn, deposes and says that he is a Special Agent with the Drug Enforcement Administration (“DEA”), and charges as follows:

COUNT ONE
(Fentanyl Trafficking Conspiracy)

1. From at least in or about November 2022 to in or about May 2023, in the Southern District of New York, China, Thailand, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, YIYI CHEN, a/k/a “Chiron,” QINGZHOU WANG, a/k/a “Bruce,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that YIYI CHEN, a/k/a “Chiron,” QINGZHOU WANG, a/k/a “Bruce,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, and others known and unknown, would and did manufacture, distribute, possess with intent to manufacture, and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that YIYI CHEN, a/k/a “Chiron,” QINGZHOU WANG, a/k/a “Bruce,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, conspired to manufacture, distribute, possess with intent to manufacture, and possess with intent to distribute

was 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846; and
Title 18, United States Code, Section 3238.)

COUNT TWO
**(Conspiracy to Import List I Chemical with Intent to
Manufacture Fentanyl)**

4. From at least in or about November 2022 to in or about May 2023, in the Southern District of New York, China, Thailand, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, YIYI CHEN, a/k/a “Chiron,” QINGZHOU WANG, a/k/a “Bruce,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

5. It was a part and an object of the conspiracy that YIYI CHEN, a/k/a “Chiron,” QINGZHOU WANG, a/k/a “Bruce,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, and others known and unknown, would and did manufacture and distribute a List I chemical, to wit, 1-boc-4-AP, intending, knowing, and having reasonable cause to believe that such chemical would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, and intending, knowing, and having reasonable cause to believe that the imported chemical would be used to manufacture a controlled substance, to wit, fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1), 959(a), 960(d)(1), and 960(d)(3), and Title 21, Code of Federal Regulations, Part 1310.02(a)(39).

(Title 21, United States Code, Section 963; and
Title 18, United States Code, Section 3238.)

COUNT THREE
**(Importation of List I Chemical with Intent to
Manufacture Fentanyl)**

6. From at least in or about March 2023 to in or about May 2023, in the Southern District of New York, China, Thailand, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, YIYI CHEN, a/k/a “Chiron,” QINGZHOU WANG, a/k/a “Bruce,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, who are expected to be first brought to and arrested in the Southern District of New York, knowingly and intentionally manufactured and distributed a List I chemical, to wit, 1-boc-4-AP, and aided and abetted the same, intending, knowing, and having reasonable cause to believe that such chemical would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, and intending, knowing, and having reasonable cause to believe that the imported chemical would be used to manufacture a controlled substance, to wit, fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1), 959(a), 960(d)(1), and 960(d)(3), and Title 21, Code of Federal Regulations, Part 1310.02(a)(39).

(Title 21, United States Code, Sections 841(a)(1), 959(a), 960(d)(1), and 960(d)(3); and Title 18, United States Code, Sections 2 and 3238.)

COUNT FOUR
**(Importation of List I Chemical with Intent to
Manufacture Fentanyl)**

7. From at least in or about November 2022 to in or about January 2023, in the Southern District of New York, China, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendant, who is expected to be first brought to and arrested in the Southern District of New York, knowingly and intentionally manufactured and distributed a List I chemical, to wit, 1-boc-4-AP, and aided and abetted the same, intending, knowing, and having reasonable cause to believe that such chemical would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, and intending, knowing, and having reasonable cause to believe that the imported chemical would be used to manufacture a controlled substance, to wit, fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1), 959(a), 960(d)(1), and 960(d)(3), and Title 21, Code of Federal Regulations, Part 1310.02(a)(39).

(Title 21, United States Code, Sections 841(a)(1), 959(a), 960(d)(1), and 960(d)(3); and Title 18, United States Code, Sections 2 and 3238.)

COUNT FIVE
(Importation of List I Chemical)

8. From at least in or about November 2022 to in or about January 2023, in the Southern District of New York, China, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendant, who is expected to be first brought to and arrested in the Southern District of New York, knowingly and intentionally manufactured and distributed a List I chemical, to wit, methylamine, and aided and abetted the same, intending, knowing, and having reasonable cause to believe that such chemical would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, in violation of Title 21, United States Code, Sections 959(a) and 960(d)(7), and Title 21, Code of Federal Regulations, Part 1310.02(a)(14).

(Title 21, United States Code, Sections 959(a) and 960(d)(7); and Title 18, United States Code, Sections 2 and 3238.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

9. I have been a DEA Special Agent since 2017. I am currently assigned to the DEA’s Special Operations Division – Bilateral Investigations Unit, which focuses on international criminal activities, including international narcotics trafficking. During my time as a DEA Special Agent, I have become familiar with some of the ways in which narcotics traffickers operate, and I have participated in numerous investigations involving international drug trafficking. This affidavit is based upon my participation in the investigation of this matter, including my conversations with law enforcement agents and other individuals, my review of photographs,

videos, and recorded communications, and my review of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated. Where figures, calculations, and dates are set forth herein, they are approximate, unless stated otherwise.

10. Based on my participation in this investigation, including my conversations with other law enforcement agents and other individuals, my review of reports and records, and my review of photographs, videos, recorded communications, and draft transcripts, summaries, and translations of such communications, I have learned the following, in substance and in part:

Overview

a. As set forth below, since in or about November 2022, the DEA has been investigating a China-based chemical company (“Company-1”) responsible for supplying massive quantities of precursor chemicals to Mexico and the United States, among other places, for the manufacture of fentanyl and other dangerous narcotics. Over the past seven months, several employees of Company-1, QINGZHOU WANG, a/k/a “Bruce,” YIYI CHEN, a/k/a “Chiron,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, sold the DEA more than 200 kilograms of fentanyl precursors and shipped those chemicals to Los Angeles and New York, knowing that the chemicals would be used to manufacture more than 50 kilograms of fentanyl in New York.

b. In or about November 2022, a DEA confidential source (“CS-1”),¹ acting at the direction of law enforcement, contacted a suspected China-based supplier of fentanyl precursors using the encrypted messaging application WhatsApp. CS-1, posing as a fentanyl trafficker in Mexico and the United States, inquired whether the supplier—who later introduced herself by the Chinese name “Er Yang” and the English name “Anita”—could provide chemicals to make fentanyl. Pursuant to these discussions, in or about January 2023, “Anita” shipped a total of nearly three kilograms of fentanyl and methamphetamine precursors from China to New York in exchange for payment in cryptocurrency.

c. In or about March 2023, “Anita” introduced CS-1 and a second DEA confidential source (“CS-2”)² to two co-conspirators in their China-based fentanyl precursor importation business: “Anita’s” colleague CHEN and “Anita’s” superior WANG. WANG and CHEN met in Bangkok, Thailand, with CS-2 and agreed to supply large quantities of fentanyl

¹ CS-1 has been a paid DEA confidential source since approximately 2009. CS-1 has no criminal history. Information provided by CS-1 has been credible, reliable, and corroborated by other evidence, including the recorded communications and seized narcotics described herein.

² CS-2 has been a paid DEA confidential source since approximately 2013. Before becoming a DEA confidential source, CS-2 was arrested for a controlled substance offense that did not result in a conviction. Information provided by CS-2 has been credible, reliable, and corroborated by other evidence, including the recorded communications and seized narcotics described herein.

precursors on a regular basis to manufacture fentanyl in New York.³ After receiving payment in cryptocurrency, WANG, CHEN, and “Anita” shipped a total of approximately 210 kilograms of fentanyl precursors from China to the United States for the purpose of manufacturing 50 to 55 kilograms of fentanyl in New York.

**The December 2022 – January 2023 Shipment of
Fentanyl and Methamphetamine Precursors**

d. In or about November and December 2022, in a series of recorded WhatsApp messages, audio calls, and video calls, CS-1 and “Anita” negotiated the sale of fentanyl precursors to CS-1 to produce fentanyl in New York. During these negotiations, “Anita” advised CS-1 that her company could ship the chemicals directly to New York and confirmed that the chemicals could be used to make fentanyl. For example, on or about November 17, 2022, CS-1 wrote to “Anita” on WhatsApp: “You know I making fentanyl,” and then “Is not safe.” “Anita” replied, “i know.” On or about December 1, 2022, “Anita” wrote to CS-1 on WhatsApp: “I know it’s normal to be cautious before embarking on a new partnership. But I’m sure you’ll be happy with our product. Not only will you be able to synthesize fentanyl, you’ll save a lot of money compared to the raw materials you’ve purchased before.”

e. During their negotiations over WhatsApp, “Anita” explained to CS-1 that “Anita” had customers in Mexico and the United States, among other places. For example, on or about November 23, 2022, “Anita” sent CS-1 a WhatsApp message containing two tracking numbers for “79099-07-3 purchased by my Sinaloa client.”⁴ Based on my training, experience, and research, I know that 79099-07-3 is the unique Chemical Abstracts Service (“CAS”) registry number for the chemical 1-boc-4-piperidone, a fentanyl precursor. Based on my training, experience, and research, I also know that the Mexican state of Sinaloa is where the Sinaloa Cartel is based, and that the Sinaloa Cartel manufactures fentanyl at massive scale using precursors shipped from China and imports and distributes the synthesized fentanyl throughout the United States, including in New York.

f. In or about December 2022, using WhatsApp, “Anita” and CS-1 finalized the sale of one kilogram of each of the chemicals bearing CAS numbers 125541-22-2, 79099-07-3, and 74-89-5, in exchange for a total of \$1,180. The DEA thereafter transferred the equivalent of approximately \$1,180 in cryptocurrency to a wallet designated by “Anita.” Based on my training, experience, and research, I know that the chemical bearing CAS number 125541-22-2 is 1-boc-4-AP; that the chemical bearing CAS number 79099-07-3 is 1-boc-4-piperidone; and that

³ Unless otherwise specified, CS-1, CS-2, YIYI CHEN, a/k/a “Chiron,” the defendant, and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendant, communicated in English. QINGZHOU WANG, a/k/a “Bruce,” the defendant, and Individual-1 (defined below), spoke in Mandarin, with CHEN translating between English and Mandarin on their behalf. All summarized, paraphrased, and quoted statements are based on draft summaries, transcriptions, and translations, and are subject to revision.

⁴ Using the tracking website link provided by “Anita,” the tracking numbers indicate that two packages were accepted by a Chinese shipper in Shenzhen, China on July 1, 2022, and arrived at a facility in Mexico on July 16, 2022.

the chemical bearing CAS number 74-89-5 is methylamine. Based on my training, experience, and research, I also know that 1-boc-4-AP and 1-boc-4-piperidone are fentanyl precursors, and that methylamine is a methamphetamine precursor. Based on my training, experience, and research, I further know that 1-boc-4-AP and methylamine are List I chemicals,⁵ and that 1-boc-4-piperidone is expected to be added as a List I chemical on May 12, 2023.⁶

g. In the course of their negotiations over WhatsApp, CS-1 asked “Anita” to send the order of fentanyl and methamphetamine precursors to an address in Manhattan, New York (the “Manhattan Address”). On or about December 13, 2022, “Anita” wrote CS-1 via WhatsApp: “I will apply for shipment today, the factory will send the goods to the forwarder, and the forwarder will give me the tracking number after delivery.” On or about December 26, 2022, “Anita” sent CS-1, via WhatsApp, an image of a U.S. shipping label (the “Shipping Label”) with an origin address in California and the destination address as the Manhattan Address. “Anita” then explained in a WhatsApp message that although the label appeared to originate in California, “it was actually sent from China” and that “[a]fter the customs clearance in China is completed, the logistics will be updated, because this is shipped by [the U.S. shipping company].”

h. On or about January 18, 2023, a DEA agent retrieved a package bearing the Shipping Label from a facility in Brooklyn, New York, where the package was transiting en route to the Manhattan Address. Inside the package were three mylar bags. The DEA lab subsequently determined that one of the bags contained approximately 999.7 grams of t-boc-4-anilinopiperidine, also known as 1-boc-4-AP, which as set forth above is a List I chemical and a fentanyl precursor. The DEA lab determined that another bag contained approximately 893.6 grams of methylamine, which as set forth above is a List I chemical and a methamphetamine precursor. The DEA lab determined that the third bag contained approximately 1002.6 grams of 1-boc-4-piperidone, which as set forth above is a fentanyl precursor and is expected to be added as a List I chemical on May 12, 2023.

The March 2023 Meeting in Bangkok, Thailand

i. After the January 2023 delivery of fentanyl and methamphetamine precursors, CS-1 and “Anita” discussed, using WhatsApp, meeting in person to continue developing a long-term business relationship to supply CS-1’s fentanyl manufacturing operation. For example, on or about March 1, 2023, on a recorded WhatsApp video call, CS-1 told “Anita” that the chemicals that “Anita” had sent were good, but that three people had purportedly died after taking the resulting fentanyl. CS-1 asked “Anita” for assistance in producing better-quality fentanyl. “Anita” responded: “I’m so sorry, I just – we just sell raw materials because fentanyl is illegal in China, and making it is also . . . illegal activity.” Later in the video call, “Anita” and CS-

⁵ See 21 C.F.R. § 1310.02(a)(14) and (39); *see also* Specific Listing for 1-boc-4-AP, a Currently Controlled List I Chemical, 87 Fed. Reg. 67,550 (Nov. 9, 2022), *available at* <https://www.federalregister.gov/documents/2022/11/09/2022-24155/specific-listing-for-1-boc-4-ap-a-currently-controlled-list-i-chemical>.

⁶ See Designation of 4-Piperidone as a List I Chemical, 88 Fed. Reg. 21,902 (Apr. 12, 2023), *available at* <https://www.federalregister.gov/documents/2023/04/12/2023-07538/designation-of-4-piperidone-as-a-list-i-chemical>.

1 agreed to meet in Thailand, together with their respective associates, to discuss a multi-ton order of fentanyl precursors.

j. On or about March 9, 2023, at the request of “Anita,” the DEA transferred the equivalent of approximately \$4,976 in cryptocurrency to a wallet designated by “Anita” as an initial payment towards an order. Based on records provided by a cryptocurrency exchange, I know that the recipient wallet is held under the Chinese name “王庆周,” which translates to “Qingzhou Wang.” As set forth below, QINGZHOU WANG, a/k/a “Bruce,” the defendant, subsequently met with CS-2 in Thailand to negotiate further sales of fentanyl precursors.

k. On or about March 17, 2023, “Anita” informed CS-1, via WhatsApp, that she would be unable to attend the meeting in Thailand but that her “boss, Bruce Wang,” later identified as described below as QINGZHOU WANG, a/k/a “Bruce,” the defendant, and her “colleague Chiron Chen,” later identified as described below as YIYI CHEN, a/k/a “Chiron,” the defendant, would attend instead. CS-1 advised “Anita” that CS-2, posing as CS-1’s boss, would attend the meeting with WANG and CHEN. “Anita” provided CS-1 with the phone numbers of WANG and CHEN to coordinate the meeting.

l. On or about March 23, 2023, CS-2, acting at the direction of law enforcement, met with WANG and CHEN at a restaurant in Bangkok, Thailand. During the meeting, which was surveilled by law enforcement and video-recorded by CS-2, the parties discussed shipping ton-quantities of fentanyl precursor to New York for CS-2’s fentanyl manufacturing operation. For example, CS-2 told WANG and CHEN that the fentanyl that CS-2 was currently producing was too strong, that several Americans had purportedly died, and that CS-2 needed a more balanced recipe. WANG told CHEN, in Mandarin: “We can guarantee the raw material because we have many clients in Mexico. If you need help with the finished product, we can communicate with our clients in Mexico.” After discussing with WANG in Mandarin, CHEN responded to CS-2, in English: “We have a lot of customers in America and Mexico, and they know how to produce, the method.” Based on my training, experience, and research, I know that most of the fentanyl that reaches the United States currently comes from Mexico. CHEN added that WANG and CHEN were willing to provide this assistance after developing a deeper business relationship with CS-2.

m. During the March 23, 2023 meeting, CHEN explained to CS-2 that his company had two bosses, WANG and another boss (“Individual-1”) in Japan. WANG placed a video call to Individual-1 in the presence of CS-2. During the video call, WANG told Individual-1, in Mandarin: “We are talking with our client. The client learned that we have 2 bosses, one in Japan, also I am the boss who is responsible for this business . . .” (which I believe was a reference to the fentanyl precursor importation business). Individual-1 and CS-2 then exchanged pleasantries.

n. I have reviewed the Chinese passports of QINGZHOU WANG, a/k/a “Bruce,” and YIYI CHEN, a/k/a “Chiron,” the defendants. Based on my review of their passport photographs, I believe that WANG and CHEN are the individuals depicted in the video recording of the March 23, 2023 meeting in Bangkok with CS-2.

**The April 2023 – May 2023 Shipment of
Fentanyl Precursors**

o. After the March 23, 2023 meeting in Bangkok, CS-1, CS-2, CHEN, WANG, and “Anita” continued their discussions in furtherance of the fentanyl trafficking business in a WhatsApp group chat, with CHEN and WANG using the phone numbers that “Anita” previously provided to CS-1 in advance of the meeting in Bangkok. For example, on or about March 27, 2023, CS-2 wrote in the group chat: “Need formula for Best fentanyl . . . As we discussed im Bangkok.” “Anita” replied in the group chat: “Tomorrow I will complete the product form and send it to this group.” In direct WhatsApp messages to CS-1 and CS-2, “Anita” warned them to avoid explicit discussion of fentanyl on the broader group chat, due to the illegality of the topic. For example, on or about March 28, 2023, “Anita” wrote CS-1 on WhatsApp: “Please tell him [CS-2] the reason why we can’t discuss openly in the group. It’s dangerous for us. Please understand.” “Anita” asked CS-1 to delete certain photographs that CS-1 had posted in the group chat, and then added, “drugs can’t be discussed openly in China.” Similarly, on or about March 30, 2023, “Anita” wrote CS-2 on WhatsApp: “When discussing the final product, please do so in private, as this is forbidden in China.” “Anita” then added: “fentanyl is recommended” because “piperidine is the best-selling product in Mexico, which is used to make fentanyl.”

p. On or about April 4, 2023, “Anita” sent CS-1 the following chart identifying the precursors (by CAS number) needed to manufacture several controlled substances, including fentanyl:

Item No.	Final product	Main Raw Material	Auxiliary Raw Materials
1	4MMC	1451-82-7	74-89-5
			872-50-4
			7647-14-5
2	Amphetamine	5449-12-7	1310-73-2
			132228-87-6
3	MDMA	28578-16-7	144-55-8
			1310-73-2
4	Fentanyl	125541-22-2	16940-66-2
			79-03-8
5	Scl-adba	109555-87-5	68-12-2
			584-08-7
			1119-6:44 AM

As set forth above, 125541-22-2 is the unique CAS number for 1-boc-4-AP, which is a fentanyl precursor and a List 1 chemical. Shortly after sending this chart, Anita wrote CS-1 on WhatsApp: “I’m sorry that I can’t post to the group, because discussing these is forbidden in China.” “Anita” subsequently deleted from WhatsApp both the chart and the message quoted in the preceding sentence.

q. On or about April 10, 2023, CS-2, CHEN, WANG, and Individual-1 held a video call to discuss their next transaction. CS-2 informed CHEN, WANG, and Individual-1 that CS-2 would order approximately 200 kilograms of chemicals for delivery to New York, in order to make 50 to 55 kilograms of the “final product.” WANG replied, “no problem.”

r. On or about April 11, 2023, CS-2 confirmed the order for a total of 210 kilograms of fentanyl precursors, including 1-boc-4-AP, over the WhatsApp group chat with CHEN, WANG, and “Anita.” The parties further agreed, on the group chat, that CS-2 would pick up the delivery from one of the sellers’ warehouses near New York City. On or about April 12, 2023, “Anita” circulated an invoice for the order on the group chat, as shown below:⁷

PROFORMA INVOICE				
Contact person:	Warehouse in USA near NY			Invoice No: AB03230413
Address:				Date: 2023-4-12
Phone number:				
Items	CAS No.	Unit price(USD)	Quantity(KG)	Total price(USD)
1-N-Boc-4-(Phenylamino)piperidine	125541-22-2	700	50	35000
Propionyl chloride	79-03-8	60	100	6000
(2-Bromoethyl)benzene	103-63-9	80	60	4800
CREDIT AMOUNT:	\$4,973			
BALANCE AMOUNT:	\$40,827			
Total AMOUNT:	\$45,800			
Seller's virtual currency account				
USDT ERC 20				
USDT TRC 20				
BITCOIN				
Seller's bank information:				
Account Name:				
Account Number:				
Bank Name:				
Bank Address:				
Country/Region:				
SWIFT Code:				
Bank Code:				
Branch Code:				

s. On or about April 13, 2023, “Anita” notified CS-1 via WhatsApp that the order would take 15 to 20 days to arrive in New York because the company needed to customize the production of 1-boc-4-AP, which as set forth above is a fentanyl precursor and List I chemical.

⁷ Based on my training, experience, and research, I know that 1-N-Boc-4-(Phenylamino)piperidine is also known as 1-boc-4-AP.

“Anita” explained to CS-1 in a WhatsApp message: “Since 125541-22-2 [1-boc-4-AP] is already the precursor of the final product, it is controlled in China.”

t. On or about April 14, 2023, the DEA transferred the equivalent of approximately \$40,934 in cryptocurrency to a wallet designated by “Anita.”

u. On or about April 29, 2023, “Anita” notified CS-1 via WhatsApp that the shipment had arrived at a warehouse near Los Angeles, California (the “Warehouse”). On or about May 2, 2023, in the group chat with CHEN, WANG, CS-1, and CS-2, “Anita” explained that “New York, the United States, has been strict in checking the precursors of the ‘final product’ some time ago, so for the sake of safety, this time it is sent to California.” “Anita” subsequently provided a contact phone number for an associate at the Warehouse and further confirmed the address of the Warehouse.

v. On or about May 5, 2023, a DEA confidential source (“CS-3”),⁸ acting at the direction of law enforcement, and in coordination with the associate at the phone number provided by “Anita,” retrieved approximately eight boxes from the Warehouse. Two of the eight boxes contained mylar bags inside of which were clear bags filled with an off-white, tan powdery substance. Six of the eight boxes contained mylar and clear packaging wrapped around blue, liquid-filled containers. Shown below are (1) the eight boxes as retrieved and situated in the bed of a pickup truck, (2) one of the mylar bags opened to show the clear bag inside filled with the off-white, tan powdery substance, and (3) one of the blue containers:



⁸ CS-3 has been a paid DEA confidential source since approximately 2015. Before becoming a DEA confidential source, CS-3 was arrested and convicted for driving under the influence. Information provided by CS-3 has been credible, reliable, and corroborated by other evidence, including the recorded communications and seized narcotics described herein.



11. WHEREFORE, I respectfully request that warrants be issued for the arrests of YIYI CHEN, a/k/a “Chiron,” QINGZHOU WANG, a/k/a “Bruce,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, and that they be arrested, and imprisoned or bailed, as the case may be.

Daniel Brooks (by VF with permission)

DANIEL BROOKS

Special Agent

Drug Enforcement Administration

Sworn to me through the transmission of this
Complaint by reliable electronic
means (Telephone), this 11 day of May 2023.



THE HONORABLE VALERIE FIGUEREDO

United States Magistrate Judge

Southern District of New York